

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

)
) Civil Action No. 03 MDL 1570 (GBD) (SN)
) ECF Case
)

This document relates to: *All Actions*

**CORRECTED DECLARATION OF GREGORY G. RAPAWY
IN SUPPORT OF DEFENDANT KINGDOM OF SAUDI ARABIA'S
RENEWED MOTION TO DISMISS**

I, Gregory G. Rapawy, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that:

1. I respectfully submit this Declaration in Support of Defendant Kingdom of Saudi Arabia's Renewed Motion To Dismiss.

2. I am a partner in the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. in Washington, D.C., which represents the Kingdom of Saudi Arabia ("Saudi Arabia") in this litigation. The following facts are based on my personal knowledge or on information provided to me. If called upon as a witness, I could and would testify competently to them.

3. Attached as Exhibit 1 is a true and correct copy of the Kingdom of Saudi Arabia's Averment of Jurisdictional Facts and Evidence in Support of Its Renewed Motion To Dismiss.

4. Attached as Exhibit 2 is a true and correct copy of a webpage titled "Basic Law of Governance" from the public-facing website of the Royal Embassy of the Kingdom of Saudi Arabia in Washington, D.C. Kellogg Hansen employees acting under my supervision obtained the document from <https://www.saudiembassy.net/basic-law-governance> and created the copy on October 4, 2023.

5. Attached as Exhibit 3 is a true and correct copy of a webpage titled "History" from the public-facing website of the Royal Embassy of the Kingdom of Saudi Arabia in Washington, D.C. Kellogg Hansen employees acting under my supervision obtained the document from <https://www.saudiembassy.net/history> and created the copy on October 4, 2023.

6. Attached as Exhibit 4 is a true and correct copy of excerpts of the Rebuttal Expert Report of David H. Rundell, dated May 16, 2022.

7. Attached as Exhibit 5 is a true and correct copy of excerpts of the final transcript of the June 15, 2022 deposition of Emile Nakhleh. A true and correct copy of an errata sheet served by Plaintiffs on August 26, 2022 is appended to Exhibit 5.

8. Attached as Exhibit 6 is a true and correct copy of excerpts of the Rebuttal Expert Report of Marc Sageman, dated May 16, 2022.

9. Attached as Exhibit 7 is a true and correct copy of excerpts of the final transcript of the June 23, 2022 deposition of Alexander Meleagrou-Hitchens.

10. Attached as Exhibit 8 is a true and correct copy of a webpage titled “U.S. Relations With Saudi Arabia – Bilateral Relations Fact Sheet” (May 11, 2022) from the public-facing website of the U.S. Department of State in Washington, D.C. Kellogg Hansen employees acting under my supervision obtained the document from <https://www.state.gov/u-s-relations-with-saudi-arabia/> and created the copy on October 5, 2023.

11. Attached as Exhibit 9 is a true and correct copy of a September 2009 report titled “Combatting Terrorism: U.S. Agencies Report Progress Countering Terrorism and Its Financing in Saudi Arabia, but Continued Focus on Counter Terrorism Financing Efforts Needed,” published by the U.S. Government Accountability Office with the designation GAO-09-933. Kellogg Hansen employees acting under my supervision obtained the document from <https://www.gao.gov/assets/gao-09-883.pdf> and created the copy on October 5, 2023.

12. Attached as Exhibit 10 is a true and correct copy of an excerpt from the book *Combating Transnational Terrorism: Searching for a New Paradigm* (Steve Tsang ed., ABC CLIO 2009). The excerpt consists of a chapter titled “Intelligence Sharing and Cooperation: Opportunities and Pitfalls” by Emile Nakhleh.

13. Attached as Exhibit 11 is a true and correct copy of a webpage titled “Iran And The Middle East Amid Shifting Alliances” from the public-facing website for LobeLog, an online blog featuring analyses of U.S. policy toward the Middle East. Kellogg Hansen employees acting under my supervision obtained the document from <https://lobelog.com/iran-and-the-middle-east-amid-shifting-alliances/> and created the copy on June 14, 2022.

14. Attached as Exhibit 12 is a true and correct copy of Exhibit 4 from the June 9, 2022 deposition of Steven Simon. It consists of the article “Why the U.S. Shouldn’t Blindly Follow Saudi Arabia” (Wall Street Journal, June 9, 2017) by Daniel Benjamin and Steven Simon.

15. Attached as Exhibit 13 is a true and correct copy of a document bearing Bates number KSA0000001137, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

16. Attached as Exhibit 14 is a true and correct copy of a document bearing Bates number KSA0000001139, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

17. Attached as Exhibit 15 is a true and correct copy of a document bearing Bates number KSA0000001110, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

18. Attached as Exhibit 16 is a true and correct copy of documents bearing Bates numbers KSA0000001106 to KSA0000001108, which were produced by Saudi Arabia in this litigation, and certified English translations of the same.

19. Attached as Exhibit 17 is a true and correct copy of documents bearing Bates numbers KSA0000001091 to KSA0000001092, which were produced by Saudi Arabia in this litigation, and certified English translations of the same.

20. Attached as Exhibit 18 is a true and correct copy of documents bearing Bates numbers KSA0000001072 to KSA0000001073, which were produced by Saudi Arabia in this litigation, and certified English translations of the same.

21. Attached as Exhibit 19 is a true and correct copy of Exhibit 364 from the January 13, 2021 deposition of Abdulaziz Abdul Kareem Al Anqari. It consists of a document bearing Bates number KSA0000001054, which was produced by Saudi Arabia in this litigation, as well as a certified English translation of the same.

22. Attached as Exhibit 20 is a true and correct copy of a document bearing Bates number KSA0000001052, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

23. Attached as Exhibit 21 is a true and correct copy of excerpts of the final transcript of the January 23, 2019 deposition of Riaz M. Khan.

24. Attached as Exhibit 22 is a true and correct copy of a document bearing Bates numbers KSA0000002072 to KSA0000002077, which was produced by Saudi Arabia in this litigation.

25. Attached as Exhibit 23 is a true and correct copy of Exhibit 392 from the January 14, 2021 deposition of Abdulaziz Abdul Kareem Al Anqari. It consists of documents bearing Bates numbers KSA0000001927 to KSA0000001955 and KSA0000002185 to KSA0000002218, which were produced by Saudi Arabia in this litigation.

26. Attached as Exhibit 24 is a true and correct copy of excerpts of the final transcript of the June 9-11, 2021 deposition of Omar Al Bayoumi.

27. Attached as Exhibit 25 is a true and correct copy of excerpts of the final transcript of the January 14, 2021 deposition of Abdulaziz Abdul Kareem Al Anqari.

28. Attached as Exhibit 26 is a true and correct copy of excerpts of the final transcript of the June 22, 2021 deposition of Samuel G. Coombs.

29. Attached as Exhibit 27 is a true and correct copy of Exhibit 722 from the June 11, 2021 deposition of Omar Al Bayoumi. It consists of a document bearing Bates numbers KSA0000001032 to KSA0000001033, which was produced by Saudi Arabia in this litigation, as well as a certified English translation of the same.

30. Attached as Exhibit 28 is a true and correct copy of Exhibit 723 from the June 11, 2021 deposition of Omar Al Bayoumi. It consists of a document bearing Bates numbers KSA0000001040 to KSA0000001041, which was produced by Saudi Arabia in this litigation, as well as a certified English translation of the same.

31. Attached as Exhibit 29 is a true and correct copy of Exhibit 724 from the June 11, 2021 deposition of Omar Al Bayoumi. It consists of a document bearing Bates number KSA0000001046, which was produced by Saudi Arabia in this litigation, as well as a certified English translation of the same.

32. Attached as Exhibit 30 is a true and correct copy of a document bearing Bates number KSA0000008778, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

33. Attached as Exhibit 31 is a true and correct copy of a document bearing Bates number KSA00000001029, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

34. Attached as Exhibit 32 is a true and correct copy of a document bearing Bates number KSA00000000712, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

35. Attached as Exhibit 33 is a true and correct copy of a document bearing Bates number KSA00000000710, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

36. Attached as Exhibit 34 is a true and correct copy of a document bearing Bates number KSA00000000711, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

37. Attached as Exhibit 35 is a true and correct copy of a document bearing Bates number KSA00000000709, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

38. Attached as Exhibit 36 is a true and correct copy of a document bearing Bates number KSA00000000813, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

39. Attached as Exhibit 37 is a true and correct copy of Exhibit 103 from the January 23, 2019 deposition of Riaz M. Khan. It consists of a document bearing Bates number DA000457 to DA000483, which was produced by Dallah Avco in this litigation.

40. Attached as Exhibit 38 is a true and correct copy of a document bearing Bates numbers DA001058 to DA001059, which was produced by Dallah Avco in this litigation.

41. Attached as Exhibit 39 is a true and correct copy of a document bearing Bates number KSA0000000989, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

42. Attached as Exhibit 40 is a true and correct copy of a document bearing Bates number KSA0000000902, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

43. Attached as Exhibit 41 is a true and correct copy of a document bearing Bates number KSA0000000872, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

44. Attached as Exhibit 42 is a true and correct copy of Exhibit 739 from the June 11, 2021 deposition of Omar Al Bayoumi. It consists of documents bearing Bates numbers KSA0000007996 to KSA0000008020, which were produced by Saudi Arabia in this litigation, as well as a certified English translation of the same.

45. Attached as Exhibit 43 is a true and correct copy of a document bearing Bates number KSA0000006692, which was produced by Saudi Arabia in this litigation.

46. Attached as Exhibit 44 is a true and correct copy of a document bearing Bates number KSA0000000840, which was produced by Saudi Arabia in this litigation.

47. Attached as Exhibit 45 is a true and correct copy of a document bearing Bates number KSA0000002829, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

48. Attached as Exhibit 46 is a true and correct copy of Exhibit 450 from the February 24, 2021 deposition of Saud bin Abdullah bin Abdulrahman Al Ghudaian. It consists

of a document bearing Bates numbers KSA0000002670 to KSA0000002671, which was produced by Saudi Arabia in this litigation, as well as a certified English translation of the same.

49. Attached as Exhibit 47 is a true and correct copy of Exhibit 459 from the March 9, 2021 deposition of Abdullah Al Awad. It consists of a document bearing Bates number KSA0000006679, which was produced by Saudi Arabia in this litigation.

50. Attached as Exhibit 48 is a true and correct copy a document bearing Bates numbers KSA0000006882 to KSA0000006902, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

51. Attached as Exhibit 49 is a true and correct copy of a document bearing Bates number KSA0000002684, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

52. Attached as Exhibit 50 is a true and correct copy of Exhibit 452 from the February 24, 2021 deposition of Saud bin Abdullah bin Adbulrahman Al Ghudaian. It consists of a document bearing Bates number KSA0000000599, which was produced by Saudi Arabia in this litigation, as well as a certified English translation of the same.

53. Attached as Exhibit 51 is a true and correct copy of Exhibit 433 from the February 23, 2021 deposition of Saud bin Abdullah bin Adbulrahman Al Ghudaian. It consists of a document bearing Bates numbers KSA0000008509 to KSA0000008510, which was produced by Saudi Arabia in this litigation, as well as a certified English translation of the same.

54. Attached as Exhibit 52 is a true and correct copy of a document bearing Bates numbers KSA0000001260 to KSA0000001266, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

55. Attached as Exhibit 53 is a true and correct copy of excerpts of the final transcript of the June 28-30, 2021 deposition of Fahad Al Thumairy.

56. Attached as Exhibit 54 is a true and correct copy of excerpts of the final transcript of the June 14, 2019 deposition of Khalil Al Khalil.

57. Attached as Exhibit 55 is a true and correct copy of a document bearing Bates number KSA0000001739, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

58. Attached as Exhibit 56 is a true and correct copy of Exhibit 782 from the June 18, 2021 deposition of Musaed Al Jarrah. It consists of documents bearing Bates numbers KSA0000008594 to KSA0000008607, which were produced by Saudi Arabia in this litigation, as well as certified English translations of the same.

59. Attached as Exhibit 57 is a true and correct copy of a document bearing Bates number KSA0000008651, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

60. Attached as Exhibit 58 is a true and correct copy of a document bearing Bates number KSA0000008652, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

61. Attached as Exhibit 59 is a true and correct copy of a document bearing Bates number KSA0000008653, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

62. Attached as Exhibit 60 is a true and correct copy of a document bearing Bates number KSA0000008654, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

63. Attached as Exhibit 61 is a true and correct copy of excerpts of the final transcript of the June 17-18, 2021 deposition of Musaed Al Jarrah.

64. Attached as Exhibit 62 is a true and correct copy of excerpts of the final transcript of the June 23, 2021 deposition of Zeinab Afifi.

65. Attached as Exhibit 63 is a true and correct copy of a document bearing Bates number KSA0000002612, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

66. Attached as Exhibit 64 is a true and correct copy of a document bearing Bates number KSA0000002572, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

67. Attached as Exhibit 65 is a true and correct copy of excerpts of the final transcript of the March 30-31, 2021 deposition of Adel Al Sadhan.

68. Attached as Exhibit 66 is a true and correct copy of a document bearing Bates numbers KSA0000001234 to KSA0000001235, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

69. Attached as Exhibit 67 is a true and correct copy of a document bearing Bates number KSA0000001247, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

70. Attached as Exhibit 68 is a true and correct copy of a document bearing Bates number KSA0000007584, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

71. Attached as Exhibit 69 is a true and correct copy of a webpage titled “Calendar For the Year (...) 1998” from www.ummulqura.org.sa, which is a public-facing website that

publishes the official calendar of Saudi Arabia, known as the Um Al-Qura calendar. Kellogg Hansen employees acting under my supervision obtained the document from <https://www.ummulqura.org.sa/yearcalender.aspx?y=1998&l=False> and created the copy on October 6, 2023.

72. Attached as Exhibit 70 is a true and correct copy of a webpage titled “Calendar For the Year (...) 1999” from www.ummulqura.org.sa. Kellogg Hansen employees acting under my supervision obtained the document from <https://www.ummulqura.org.sa/yearcalender.aspx?y=1999&l=False> and created the copy on October 6, 2023.

73. Attached as Exhibit 71 is a true and correct copy of a webpage titled “Calendar For the Year (...) 2000” from www.ummulqura.org.sa. Kellogg Hansen employees acting under my supervision obtained the document from <https://www.ummulqura.org.sa/yearcalender.aspx?y=2000&l=False> and created the copy on October 6, 2023.

74. Attached as Exhibit 72 is a true and correct copy of a webpage titled “Calendar For the Year (...) 2001” from www.ummulqura.org.sa. Kellogg Hansen employees acting under my supervision obtained the document from <https://www.ummulqura.org.sa/yearcalender.aspx?y=2001&l=False> and created the copy on October 6, 2023.

75. Attached as Exhibit 73 is a true and correct copy of a webpage titled “Calendar For the Year (...) 2002” from www.ummulqura.org.sa. Kellogg Hansen employees acting under my supervision obtained the document from

<https://www.ummulqura.org.sa/yearcalender.aspx?y=2002&l=False> and created the copy on October 6, 2023.

76. Attached as Exhibit 74 is a true and correct copy of excerpts of the final transcript of the April 1-2, 2021 deposition of Mutaed Al Sudairy.

77. Attached as Exhibit 75 is a true and correct copy of excerpts of the final transcript of the April 7 and 9, 2021 deposition of Abdullah Al Jaithen.

78. Attached as Exhibit 76 is a true and correct copy of excerpts of the final transcript of the May 27-28, 2021 deposition of Majed Al Mersal.

79. Attached as Exhibit 77 is a true and correct copy of Exhibit 603 from the April 21, 2021 deposition of Ismail (Smail) Ammar Mohamed Mana. It consists of the Declaration of Smail Mana, executed on November 2, 2019.

80. Attached as Exhibit 78 is a true and correct copy of excerpts of the 9/11 Commission Report.

81. Attached as Exhibit 79 is a true and correct copy of Exhibit 12 from the June 15, 2022 deposition of Emile Nakhleh. It consists of a document with the file name 8F496071D25B831EFBFD5299FBC0DF62_msoB4938.jpg, which is posted on the CIA's public-facing website at https://www.cia.gov/library/abbottabad-compound/8F/8F496071D25B831EFBFD5299FBC0DF62_msoB4938.jpg, and a certified English translation of the same.

82. Attached as Exhibit 80 is a true and correct copy of Exhibit 10 from the June 29, 2022 deposition of Bassem Youssef. It consists of a document bearing Bates numbers EO14040-000001 to EO14040-000014, which was publicly released by the FBI pursuant to Executive Order 14040.

83. Attached as Exhibit 81 is a true and correct copy of a document bearing Bates numbers CIA00088 to CIA00149, which was produced by the CIA in this litigation.

84. Attached as Exhibit 82 is a true and correct copy of Exhibit 1 from the June 15, 2022 deposition of Emile Nakhleh. It consists of a document bearing Bates numbers EO14040-003414-UPDATED-MDL to EO14040-003442-UPDATED-MDL, which was produced by the FBI in this litigation.

85. Attached as Exhibit 83 is a true and correct copy of a report titled “Monograph on Terrorist Financing” by National Commission on Terrorist Attacks Upon the United States staff members John Roth, Douglas Greenburg, and Serena Wille.

86. Attached as Exhibit 84 is a true and correct copy of excerpts of the final transcript of the [REDACTED].

87. Attached as Exhibit 85 is a true and correct copy of Exhibit 463 from the March 9, 2021 deposition of Abdullah Al Awad. It consists of documents bearing Bates numbers KSA0000006642 to KSA0000006665, which were produced by Saudi Arabia in this litigation, and certified English translations of the Arabic-language documents.

88. Attached as Exhibit 86 is a true and correct copy of Exhibit 789 from the June 21, 2021 deposition of Morgan. It consists of the Declaration of Kaysan Morgan, executed on October 29, 2020.

89. Attached as Exhibit 87 is a true and correct copy of excerpts of the final transcript of the April 21, 2021 deposition of Ismail (Smail) Ammar Mohamed Mana.

90. Attached as Exhibit 88 is a true and correct copy of excerpts of the final transcript of the June 21, 2021 deposition of Kaysan Morgan.

91. Attached as Exhibit 89 is a true and correct copy of Exhibit 704 from the June 10, 2021 deposition of Omar Al Bayoumi. It consists of documents bearing Bates numbers FBI008023 to FBI008060, which were produced by the FBI in this litigation.

92. Attached as Exhibit 90 is a true and correct copy of the Declaration of Holly Ratchford, executed on May 29, 2021, and accompanying exhibits.

93. Attached as Exhibit 91 is a true and correct copy of Exhibit 737 from the June 11, 2021 deposition of Omar Al Bayoumi. It consists of a document bearing Bates numbers FBI002808 to FBI002809, which was produced by the FBI in this litigation.

94. Attached as Exhibit 92 is a true and correct copy of a document bearing Bates numbers FBI004014 to FBI004018, which was produced by the FBI in this litigation.

95. Attached as Exhibit 93 is a true and correct copy of excerpts of the final transcript of [REDACTED]
[REDACTED]).

96. Attached as Exhibit 94 is a true and correct copy of Exhibit 3 from the June 23, 2022 deposition of Alexander Meleagrou-Hitchens. It consists of an excerpt of the book *Incitement: Anwar Al-Awlaki's Western Jihad* (Harvard Univ. Press 2020) by Alexander Meleagrou-Hitchens.

97. Attached as Exhibit 95 is a true and correct copy of a webpage titled "Remarks by the President at the National Defense University" from the public-facing website of the archives of the White House under President Barack Obama. Kellogg Hansen employees acting under my supervision obtained the document from <https://obamawhitehouse.archives.gov/the-press-office/2013/05/23/remarks-president-national-defense-university> and created the copy on October 4, 2023.

98. Attached as Exhibit 96 is a true and correct copy of excerpts of the publicly released version of a November 2004 report titled “A Review of the FBI’s Handling of Intelligence Information Related to the September 11 Attacks” by the Office of the Inspector General of the U.S. Department of Justice.

99. Attached as Exhibit 97 is a true and correct copy of a document titled “California Death Record” obtained from the LexisNexis service. This document is not an official record but is provided for the Court’s information to show the date of death of Abdussattar Shaikh. Kellogg Hansen employees acting under my supervision created the copy on October 2, 2023.

100. Attached as Exhibit 98 is a true and correct copy of Exhibit 3B from [REDACTED]. It consists of a document bearing Bates number FBI004007, which was produced by the FBI in this litigation.

101. Attached as Exhibit 99 is a true and correct copy of excerpts of the final transcript of the March 11, 2020 deposition of Akram Alzamari.

102. Attached as Exhibit 100 is a true and correct copy of Exhibit 413 from the February 10, 2021 deposition of Ahmed Al Qattan. It consists of a document bearing Bates number KSA0000008440, which was produced by Saudi Arabia in this litigation, as well as a certified English translation of the same.

103. Attached as Exhibit 101 is a true and correct copy of a document bearing Bates number FBI001342, which was produced by the FBI in this litigation, and a certified English translation of the same.

104. Attached as Exhibit 102 is a true and correct copy of Exhibit 685 from the June 9, 2021 deposition of Omar Al Bayoumi. It consists of a document bearing Bates number

FBI001343, which was produced by the FBI in this litigation, as well as a certified English translation of the same.

105. Attached as Exhibit 103 is a true and correct copy of Exhibit 686 from the June 9, 2021 deposition of Omar Al Bayoumi. It consists of a document bearing Bates number FBI001344, which was produced by the FBI in this litigation, as well as a certified English translation of the same.

106. Attached as Exhibit 104 is a true and correct copy of Exhibit 445 from the February 23, 2021 deposition of Saud bin Abdullah bin Abdulrahman Al Ghudaian. It consists of a document bearing Bates number KSA0000007591, which was produced by Saudi Arabia in this litigation, as well as a certified English translation of the same.

107. Attached as Exhibit 105 is a true and correct copy of Exhibit 836 from the June 28, 2021 deposition of Fahad Al Thumairy. It consists of a document bearing Bates numbers KSA0000008496 to KSA0000008498, which was produced by Saudi Arabia in this litigation, as well as a certified English translation of the same.

108. Attached as Exhibit 106 is a true and correct copy of a document bearing Bates number KSA0000000596, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

109. Attached as Exhibit 107 is a true and correct copy of Exhibit 417 from the February 10, 2021 deposition of Ahmed Al Qattan. It consists of a documents bearing Bates numbers KSA0000007805 to KSA0000007808, which were produced by Saudi Arabia in this litigation, as well as certified English translations of the same.

110. Attached as Exhibit 108 is a true and correct copy of Exhibit 446 from the February 23, 2021 deposition of Saud bin Abdullah bin Abdulrahman Al Ghudaian. It consists

of a document bearing Bates number KSA0000009538, which was produced by Saudi Arabia in this litigation, as well as a certified English translation of the same.

111. Attached as Exhibit 109 is a true and correct copy of Exhibit 576 from the April 7, 2021 deposition of Abdullah Al Jaithen. It consists of a document bearing Bates numbers FBI004012 to FBI004013, which was produced by the FBI in this litigation.

112. Attached as Exhibit 110 is a true and correct copy of a document bearing Bates numbers FBI003154 to FBI003166, which was produced by the FBI in this litigation.

113. Attached as Exhibit 111 is a true and correct copy of a document bearing Bates numbers FBI003167 to FBI003172, which was produced by the FBI in this litigation.

114. Attached as Exhibit 112 is a true and correct copy of a document bearing Bates numbers FBI003173 to FBI003179, which was produced by the FBI in this litigation.

115. Attached as Exhibit 113 is a true and correct copy of a document bearing Bates numbers FBI003180 to FBI003186, which was produced by the FBI in this litigation.

116. Attached as Exhibit 114 is a true and correct copy of a document bearing Bates numbers FBI003187 to FBI003194, which was produced by the FBI in this litigation.

117. Attached as Exhibit 115 is a true and correct copy of a document bearing Bates numbers FBI003221 to FBI003234, which was produced by the FBI in this litigation.

118. Attached as Exhibit 116 is a true and correct copy of a document bearing Bates numbers FBI003235 to FBI003249, which was produced by the FBI in this litigation.

119. Attached as Exhibit 117 is a true and correct copy of a document bearing Bates numbers FBI003250 to FBI003263, which was produced by the FBI in this litigation.

120. Attached as Exhibit 118 is a true and correct copy of excerpts of the version of the expert report of Bassem Youssef served by Plaintiffs on May 3, 2023. A true and correct copy of an errata sheet served by Plaintiffs on May 3, 2023 is appended to Exhibit 118.

121. Attached as Exhibit 119 is a true and correct copy of a document bearing Bates numbers FBI001444 to FBI001447, which was produced by the FBI in this litigation.

122. Attached as Exhibit 120 is a true and correct copy of a document bearing Bates numbers FBI001448 to FBI001449, which was produced by the FBI in this litigation.

123. Attached as Exhibit 121 is a true and correct copy of a document bearing Bates numbers FBI001450 to FBI001452, which was produced by the FBI in this litigation.

124. Attached as Exhibit 122 is a true and correct copy of a document bearing Bates numbers FBI001453 to FBI001455, which was produced by the FBI in this litigation.

125. Attached as Exhibit 123 is a true and correct copy of a document bearing Bates numbers FBI001456 to FBI001459, which was produced by the FBI in this litigation.

126. Attached as Exhibit 124 is a true and correct copy of a document bearing Bates numbers FBI000510 to FBI000511, which was produced by the FBI in this litigation.

127. Attached as Exhibit 125 is a true and correct copy of a document bearing Bates numbers FBI000512 to FBI000521, which was produced by the FBI in this litigation.

128. Attached as Exhibit 126 is a true and correct copy of a document bearing Bates numbers FBI000548 to FBI000558, which was produced by the FBI in this litigation.

129. Attached as Exhibit 127 is a true and correct copy of a document bearing Bates numbers FBI000559 to FBI000572, which was produced by the FBI in this litigation.

130. Attached as Exhibit 128 is a true and correct copy of a document bearing Bates numbers FBI000573 to FBI000580, which was produced by the FBI in this litigation.

131. Attached as Exhibit 129 is a true and correct copy of a document bearing Bates numbers FBI000581 to FBI000590, which was produced by the FBI in this litigation.

132. Attached as Exhibit 130 is a true and correct copy of a document bearing Bates numbers KFM 0172 to KFM 0184, which was produced by the King Fahad Mosque in this litigation.

133. Attached as Exhibit 131 is a true and correct copy of a document bearing Bates numbers KFM 0285 to KFM 0296, which was produced by the King Fahad Mosque in this litigation.

134. Attached as Exhibit 132 is a true and correct copy of a document bearing Bates numbers KFM 0474 to KFM 0479, which was produced by the King Fahad Mosque in this litigation.

135. Attached as Exhibit 133 is a true and correct copy of a document bearing Bates numbers KFM 0480 to KFM 0489, which was produced by the King Fahad Mosque in this litigation.

136. Attached as Exhibit 134 is a true and correct copy of a document bearing Bates numbers FBI000365 to FBI000367, which was produced by the FBI in this litigation.

137. Attached as Exhibit 135 is a true and correct copy of Exhibit 462 from the March 9, 2021 deposition of Abdullah Al Awad. It consists of a document produced by AT&T in this litigation in response to a subpoena served by Plaintiffs.

138. Attached as Exhibit 136 is a true and correct copy of Exhibit 671 from the June 3, 2021 deposition of Faisal Al Muhanna. It consists of a document produced by AT&T in this litigation in response to a subpoena served by Plaintiffs.

139. Attached as Exhibit 137 is a true and correct copy of a document titled “SUBSCRIBER INFORMATION FOR [REDACTED]-3362,” with a “Start Srv” date of “06/10/2000,” which was produced by AT&T in this litigation in response to a subpoena served by Plaintiffs.

140. Attached as Exhibit 138 is a true and correct copy of excerpts of the final transcript of the February 10, 2021 deposition of Ahmed Al Qattan.

141. Attached as Exhibit 139 is a true and correct copy of a document bearing Bates numbers STATE00139 to STATE00140, which was produced by the U.S. Department of State in this litigation.

142. Attached as Exhibit 140 is a true and correct copy of Exhibit 12 from the June 22, 2022 deposition of Lawrence Dunham. It consists of a document bearing Bates numbers STATE00033 to STATE00040, which was produced by the U.S. Department of State in this litigation.

143. Attached as Exhibit 141 is a true and correct copy of a document bearing Bates number KSA0000006810, which was produced by Saudi Arabia in this litigation.

144. Attached as Exhibit 142 is a true and correct copy of a document bearing Bates numbers KSA0000006863 to KSA0000006865, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

145. Attached as Exhibit 143 is a true and correct copy of excerpts of the final transcript of the June 12, 2019 deposition of Osman Kaldirim.

146. Attached as Exhibit 144 is a true and correct copy of Exhibit 830 from the June 25, 2021 deposition of Usman Madha. It consists of the Declaration of Usman Madha, executed on May 28, 2021, with exhibits omitted.

147. Attached as Exhibit 145 is a true and correct copy of excerpts of the final transcript of the June 25, 2021 deposition of Usman Madha.

148. Attached as Exhibit 146 is a true and correct copy of Exhibit 3 from the July 11, 2022 deposition of Barry Schiff. It consists of a document bearing the exhibit reference number “MGL/1,” which was produced by Plaintiffs in this litigation. *See* ECF No. 7957-1. At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom’s Metropolitan Police Service. *See id.*

149. Attached as Exhibit 147 is a true and correct copy of excerpts of the final transcript of the July 11, 2022 deposition of Barry Schiff.

150. Attached as Exhibit 148 is a true and correct copy of excerpts of the Rebuttal Expert Report of Douglas M. Moss, dated May 16, 2022.

151. Attached as Exhibit 149 is a true and correct copy of a document bearing Bates number KSA0000000655, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

152. Attached as Exhibit 150 is a true and correct copy of Exhibit 7 from the June 29, 2022 deposition of Bassem Youssef. It consists of a document bearing Bates numbers EO14040-000273-UPDATED-MDL to EO14040-000276-UPDATED-MDL, which was produced by the FBI in this litigation.

153. Attached as Exhibit 151 is a true and correct copy of Exhibit 9 from the June 29, 2022 deposition of Bassem Youssef. It consists of a document bearing Bates numbers EO14040-000222-UPDATED-MDL to EO14040-000227-UPDATED-MDL, which was produced by the FBI in this litigation.

154. Attached as Exhibit 152 is a true and correct copy of Exhibit 5 from the June 29, 2022 deposition of Bassem Youssef. It consists of a document bearing Bates numbers EO14040-000533-MDL to EO14040-000535-MDL, which was produced by the FBI in this litigation.

155. Attached as Exhibit 153 is a true and correct copy of excerpts of the version of the expert report of Emile Nakhleh served by Plaintiffs on May 14, 2022. A true and correct copy of an errata sheet served by Plaintiffs on May 14, 2022 is appended to Exhibit 153.

156. Attached as Exhibit 154 is a true and correct copy of Exhibit 1E from [REDACTED]. It consists of a document bearing Bates numbers FBI000172 to FBI000177, which was produced by the FBI in this litigation.

157. Attached as Exhibit 155 is a true and correct copy of excerpts of the final transcript of the June 3, 2021 deposition of Faisal Al-Muhanna.

158. Attached as Exhibit 156 is a true and correct copy of the Declaration of Mohamed A. Aloraiffee, executed on October 6, 2023.

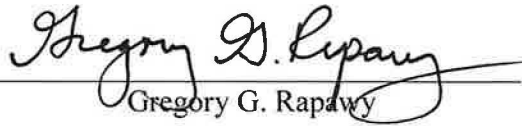
159. Attached as Exhibit 157 is a true and correct copy of the Declaration of Eyad Abdulrahman Algarawi, executed on October 6, 2023.

160. Attached as Exhibit 158 is a true and correct copy of the Declaration of Saad Fahad Al Nassar, executed on October 6, 2023.

161. Attached as Exhibit 159 is a true and correct copy of the Declaration of Prince Musad bin Mohammed Alfahad F. Alfarhan Al Saud, executed on October 6, 2023.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: October 27, 2023
Washington, D.C.



Gregory G. Rapawy